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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO ONE HUNDRED
SEVENTEENTH OMNIBUS OBJECTION TO
CLAIMS AND REQUEST FOR ORDER BY
DEFAULT AS TO UNOPPOSED
OBJECTIONS**

[Re: Dkt. No. 12509]

**Regarding Objections Set for Hearing
July 26, 2022, at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule
5 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District
6 of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter an order by default on the following omnibus claims
9 objection (the “**Omnibus Objection**”):

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Docket Number	Omnibus Objection
12509	<i>Reorganized Debtors’ One Hundred Seventeenth Omnibus Objection to Claims (Satisfied Claims / No Liability Claims)</i> (the “ Omnibus Objection ”)

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13 **RELIEF REQUESTED IN THE OMNIBUS OBJECTION**

14 The Omnibus Objection seeks to disallow and expunge the Proof of Claim listed in
15 Exhibit 1 to the Omnibus Objection.

16 **NOTICE AND SERVICE**

17 The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection
18 [Docket No. 12511]. The Omnibus Objection was also supported by the declaration of Robb
19 McWilliams [Docket No. 12510] (the “Declaration”). The Omnibus Objection, the Notice of Hearing,
20 and the Declaration were served as described in the *Certificate of Service of Sonia Akter*, filed on June
21 26, 2022 [Docket No. 12553]. Each holder of a claim listed on Exhibit 1 to the Omnibus Objection
22 received a notice customized to include the claim number, debtor, claim amount and priority, and the
23 basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and
24 expunged.

25 The deadline to file responses or oppositions to the Omnibus Objection has passed. The
26 Reorganized Debtors did not receive any formal and informal responses.

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1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.

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